

# CROW TRIBE EXECUTIVE BRANCH

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July 16, 2021

Joyce Ackerman  
On-Scene Coordinator  
EPA Region 8  
1595 Wynkoop Street, SEM-EM-RS  
Denver, CO 80202

Hello Joyce Ackerman and David Romero,

The Crow Tribe is requesting assistance from the U.S. EPA to conduct emergency response site cleanup of the old tribal executive office building that burned down in May 2019. In the Phase II Environmental Site Assessment (Phase II ESA) for the Crow Tribal building conducted by Weston Solutions, Inc. under the guidance of U.S. EPA reported that of the 191 bulk samples submitted for laboratory analysis, 22 samples displayed positive results of asbestos (> 1% asbestos). These positive asbestos results ranged from 5% to 75% total asbestos. To further illustrate the point, 4 of the 6 dust wipe samples collected revealed the presence of asbestos. Using both of these results from the Phase II ESA, the exposure of asbestos as an exposure pathway

Target Analytes	Media	Contaminants Present Above Screening Benchmarks	Exposure Pathway	Exposure Route	Human Receptors	
					Residential	Workers
ACM	Building Materials and Dust	Yes	Potentially Complete	Dermal	--	X
				Ingestion	--	X
				Inhalation	--	X
ACM	Soil	No	Incomplete	Dermal	--	--
				Ingestion	--	--
				Inhalation	--	--
LBP	Building Materials	Yes	Potentially Complete	Dermal	--	X
				Ingestion	--	X
				Inhalation	--	X
Mercury, PCBs, and Mold	Building Materials	Yes (PCBs and Mold)	Potentially Complete	Dermal	--	X
				Ingestion	--	X
				Inhalation	--	X

Notes: -- = Receptor not at risk (Currently) X = Receptor at risk to exposure (Currently or Potentially)

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is presented in the table (table is from Phase II ESA prepared for the U.S. EPA on behalf of the Crow Tribe). This table displays that human receptors/exposure is only for "Workers" and not for residential persons. However, the real "threat" is to the community of Crow Agency, in that, there are no barricades/fences in place to keep the public out. This table shows that exposure for asbestos containing materials (ACM), lead-based paint (LBP), polychlorinated biphenyl (PCB), and mold can be exposed to people who are working on the

burned down Crow Tribal building, yet, without the barricades/fences these contaminants of concern (COC) can affect "unknowing" tribal community members. This threat is further exacerbated by the park that is across the street from the burned tribal building increasing the potential for trespassing and exposure to COCs.

Due to the COVID-19 pandemic and the subsequent quarantine, the resources of the Crow Tribe have been extremely taxed. The Crow Tribe would greatly appreciate any and all assistance that can be provided in addressing these hazards for the Crow Agency community.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank White Clay". The signature is fluid and cursive, with the first name "Frank" being more prominent.

Frank White Clay  
Chairman of the Crow Tribe